

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**LINDA HENDERSON AND ALL
OTHER OCCUPANTS OF 1225
KENSINGTON DR., DESOTO, TX
75115**

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Plaintiff,

v.

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CIVIL ACTION NO. 3:18-cv-945-K (BT)

**FIRST MORTGAGE CORPORATION
and FREEDOM MORTGAGE
CORPORATION,**

Defendants.

AGREED MOTION TO EXTEND DEADLINES

Defendants Freedom Mortgage Corporation and First Mortgage Corporation (“Defendants”) and Plaintiff Linda Henderson (“Plaintiff”) file this Agreed Motion to Extend Deadlines and respectfully submit the following:

1. On March 9, 2018, Plaintiff Linda Henderson filed Plaintiff’s Original Petition and Application for Temporary Restraining Order, Temporary Injunction and Permanent Injunction (the “Complaint”) against Defendants in the 95th Judicial District Court of Dallas County, Texas.
2. Defendants filed their answers on March 27, 2018 and .
3. Defendants removed this case to the Northern District of Texas, Dallas Division on April 13, 2018.
4. On June 6, 2018, this Court entered a Pretrial Scheduling Order. The deadline for Dispositive Motions in this order is December 31, 2018.
5. On June 19, 2018, Defendant Freedom Mortgage Corporation filed a Motion for

Judgment on the Pleadings, that motion remains pending before the Court. On July 2, 2018, Defendant First Mortgage Corporation filed a Motion for Judgment on the Pleadings, that motion remains pending before the Court.

6. On July 20, 2018, Defendant Freedom Mortgage Corporation filed a Notice of No Response to Its Motion for Judgment on the Pleadings. On August 28, 2018, Defendant First Mortgage Corporation filed a Notice of No Response to Its Motion for Judgment on the Pleadings.

7. The reason for this extension is to (i) permit the Court to rule on any pending motions which might be dispositive of the case, and (ii) to permit Ms. Henderson additional time to prosecute her case.

8. Accordingly, Defendants and Plaintiff Linda Henderson request that the Court extend all the remaining outstanding Deadlines in the Court's Pre-Trial Scheduling Order not less than ninety (90) days from their present settings, and continue the present trial setting accordingly and as the Court's docket permits. The proposed new deadlines are as follows:

Completion of Discovery: All fact and expert discovery must be initiated in time to be completed by **February 14, 2019;**

Dispositive Motions: All motions that would dispose of all or any part of this case, including motions for summary judgment, must be filed by **April 1, 2019;**

Trial: The District Court will set this case for a **BENCH TRIAL** by separate order after all dispositive motions have been decided.

For the foregoing reasons, Defendants Freedom Mortgage Corporation, First Mortgage Corporation and Plaintiff Linda Henderson respectfully request this Court grant their Agreed Motion to Extend any and all outstanding deadlines not less than ninety (90) days from their present settings; and for such other relief to which Defendants Freedom Mortgage Corporation, First Mortgage Corporation and Plaintiff Linda Henderson may be justly entitled.

Respectfully submitted,

By: /s/ Matt D. Manning

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By: /s/ Brandon Hakari (signed by permission)

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Attorney for Defendant

First Mortgage Corporation

By: /s/ Linda Henderson w/ permission

Linda Henderson

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Pro Se Plaintiff

CERTIFICATE OF CONFERENCE

I hereby certify to the Court that I have conferred with Brandon Hakari, counsel for First Mortgage Corporation, and he indicated his client is agreed to the relief sought. I have also conferred with Linda Henderson, Pro Se Plaintiff, concerning the relief requested in this Motion, and Ms. Henderson indicated that she agreed to the relief requested in this Motion.

/s/ Matt D. Manning
Matt D. Manning

CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of December, 2018, a copy of this document was served on the *pro se* Plaintiff and Defendant First Mortgage Corporation's counsel in accordance with the Federal Rules of Civil Procedure, as follows:

Via Court's ECF E-Filing System and/or Via Email (hendersonl1965@gmail.com)

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